

1 **STIP**

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14 *Attorneys for Plaintiff*

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 BELINDA FOREMAN, an Individual,

18 Plaintiff,

19 vs.

20 STATE OF NEVADA, ex rel. NEVADA
21 SYSTEM OF HIGHER EDUCATION,
22 UNIVERSITY OF NEVADA, LAS
23 VEGAS, a Foreign Limited Liability
24 Company, DOES I -X; ROE
25 CORPORATIONS I -X.

26 Defendant.

CASE NO.: 2:18-cv-01485-APG-CWH

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS
COMPLAINT**

27 IT IS HEREBY STIPULATED AND REQUESTED by the parties through their
28 respective attorneys that Plaintiff Belinda Foreman's deadline to oppose Defendant's Motion
to Dismiss Complaint be extended by one (1) week.

1. On September 5, 2018, Defendant filed its Motion to Dismiss the Complaint in
this matter. The current deadline for Plaintiff's Opposition is September 19, 2018.

2. On September 17, 2018, Marta D. Kurshumova, counsel for Plaintiff, conferred
with Lynda P. King, counsel for Defendant, regarding the deadline for Plaintiff's Opposition.

1 Counsel for Defendant consented to Plaintiff's request to extend the time for filing the
2 Opposition by seven (7) days, which would make the new deadline Wednesday, September 26,
3 2018. Therefore, the parties respectfully request that the deadline be moved to September 26,
4 2018, and any response day be extended by ten (10) days.

5 3. Good cause exists for this extension as Plaintiff's primary counsel, Jenny Foley,
6 is out of state from September 17, 2018 through September 24, 2018 for a family commitment.

7 4. The extension will not result in undue delay in the administration of this cause.

8 5. No other extension of time has been previously requested in this case with
9 respect to the opposition to Defendant's Motion to Dismiss.
10

11 This stipulation and request is submitted pursuant to LR 7-1 and FRCP 6. This document
12 is being electronically filed through the Court's ECF System. In this regard, counsel for Plaintiff
13 hereby attests that (1) the content of this document is acceptable to all persons required to sign
14 the document; (2) Defendant's counsel has concurred with the filing of this document; and (3)
15 a record supporting this concurrence is available for inspection or production if so ordered.
16

17 Respectfully submitted,

18 **HKM EMPLOYMENT ATTORNEYS, LLP**

19
20 DATED: September 17, 2018

21 By: /s/ Marta D. Kurshumova
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1 UNIVERSITY OF NEVADA, LAS VEGAS

2 DATED: September 17, 2018

By: /s/ Lynda P. King

LYNDA P. KING

Assistant General Counsel

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Attorney for Defendant

9 ORDER

10 IT IS SO ORDERED.

11 

UNITED STATES DISTRICT JUDGE

Dated: September 18, 2018.